

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
SRINATH DHARMAPADAM	:	SUB CHAPTER V
PURVI SRINATH DHARMAPADAM	:	
Debtors	:	CASE NO. 4-23-00487-MJC
	:	
LISA A. RYNARD, ESQUIRE	:	
SUB CHAPTER V TRUSTEE	:	
Trustee/Movant	:	
	:	
vs.	:	
	:	
SRINATH DHARMAPADAM	:	
PURVI SRINATH DHARMAPADAM	:	
Respondents	:	

**SUB CHAPTER V TRUSTEE'S OBJECTION TO DEBTORS' PLAN OF
REORGANIZATION, DATED JUNE 5, 2023**

AND NOW, comes Lisa A. Rynard, Esquire, Sub Chapter V Trustee ("Trustee"), and objects to the confirmation of Srinath Dharmapadam and Purvi Srinath Dharmapadam's Sub Chapter V Plan of Reorganization, Dated June 5, 2023, Document #40 ("Plan"). In support of this Objection, the Trustee states as follows:

1. Srinath Dharmapadam and Purvi Srinath Dharmapadam ("Debtors") filed a Sub Chapter V Bankruptcy proceeding to the above case number on March 8, 2023.
2. Movant was appointed the Sub Chapter V Trustee pursuant to 11 U.S.C. §1183(a) on March 9, 2023.
3. Section 1183(b) enumerates the Trustee's duties, which include the right to "appear and be heard" with respect to "any hearing that concerns . . . confirmation of a plan filed under this subchapter." 11 U.S.C. §1183(b)(3)(B).
4. Consistent with 11 U.S.C. §1189, the Debtors filed their Plan on June 5, 2023.
5. The last date for objections to the Plan has been set as July 13, 2023.

6. The Hearing on Confirmation of the Plan has been scheduled for July 20, 2023.

7. In order for the Court to confirm the Plan, the Plan must satisfy all of the requirements of 11 U.S.C. §1191, which includes that the Plan meets “all the requirements of 11 U.S.C. §1129(a), other than paragraph (15) of that section.” It does not.

8. The Plan does not comply with 11 U.S.C. §1129(a)(7) in that it fails to provide the holder of each claim the value that is not less than the amount such holder would so receive or retain if the Debtors were liquidated under Chapter 7.

WHEREFORE, Trustee prays that this Court sustain its Objection and enter an order denying confirmation of the Plan and grant such other relief as is equitable and just.

Respectfully submitted,

LAW OFFICE OF LISA A. RYNARD

By: /s/ Lisa A. Rynard, Esquire
Lisa A. Rynard, Esquire
Sub Chapter V Trustee
240 Broad Street
Montoursville, PA 17754
(570) 505-3289
larynard@larynardlaw.com

Dated: July 12, 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a true and correct copy of the SUB CHAPTER V TRUSTEE'S OBJECTION TO DEBTORS' PLAN OF REORGANIZATION, DATED JUNE 5, 2023 was served on the following parties in this manner:

<u>Name and Address</u>	<u>Mode of Service</u>
Gary J. Imblum, Esquire Counsel for Debtors <u>Gary.Imblum@imblumlaw.com</u>	Via ECF/CM
Joseph P. Schalk, Esquire Office of the United States Trustee <u>Joseph.Schalk@usdoj.gov</u>	Via ECF/CM

Date: July 12, 2023

By: /s/ Lisa A. Rynard
Lisa A. Rynard